Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
IP-Enabled Services	)	**WC Docket No. 04-36**
	)	
E911 Requirements for IP-Enabled Service Providers	)	**WC Docket No. 05-196**
	)	

COMMENTS OF INTRADO INC.

Intrado Inc. (Intrado) submits these comments in agreement with the Joint Petition for Clarification of the National Emergency Number Association (NENA) and the Voice on the Net (VON) Coalition (Petition), specifically in regards to the Petition's reference to "Ensuring that the PSAP is provided an accurate and unambiguous location of an emergency is critical to the functioning of the E9-1-1 system."[1] Intrado is already on record affirming the need for accurate and consistently spelled address information to be presented to the Public Safety Answering Points (PSAPs).[2] In addition, Intrado will provide further comment on the Petition's discussions regarding the Ability to Access Selective Router Via the Public Switched Telephone Network (PSTN) and Automatically Obtained Location Information As "Registered Location."

DISCUSSION

I. Address Validation

PSAPs recognized long ago that address information passed from wireline front end order entry processes were frequently subject to order entry typing errors and alias street and community name spellings. Alias names in public safety refers to locations (streets and/or communities) having multiple names for the same location. Such anomalies and spelling variations limited public safety's ability to designate 911 attributes, like

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[1] *JOINT PETITION FOR CLARIFICATION OF THE NATIONAL EMERGENCY NUMBER ASSOCIATION AND THE VOICE ON THE NET (VON) COALITION,* WC Docket No. 04-36; WC Docket No. 05-196, July 29, 2005.

[2] Intrado Comments at 2, WC Docket No. 05-196 (filed August 15, 2005).

Selective Router and emergency responder information, as well as to integrate Computer Aided Dispatch (CAD) and Geographic Information Systems (GIS) in an automated fashion.

To ensure interoperability of these critical emergency response systems, the public safety community established a Master Street Address Guide (MSAG) process that would aid in the accurate assignment of 911 selective routing and emergency responder information; that would reduce the volume of ambiguous addresses being presented to the call takers and would improve their responsiveness to emergencies through the use of backend systems.

The MSAG process ensures location information is presented to the call taker and backroom support systems (CAD, GIS, etc.) in a consistent manner. If location information entered by the VoIP end user as the "Registered Location" were permitted to pass to the PSAP without first being submitted to the MSAG process, the likelihood that an ambiguous address would be passed to the PSAP during a call would be extremely high; rendering the vital backroom systems useless and perhaps resulting in a greater likelihood of loss of property or life.

Intrado strongly believes that the Registered Location must be validated via the MSAG process *and modified* as necessary during the service provisioning process to ensure that calls are routed to the correct PSAP, appropriate call detail is displayed and that the viability and interoperability of emergency response systems are not diminished and rendered useless. During recent studies by Intrado, it was found that Registered Locations as entered by the VoIP end users failed to validate to the PSAPs MSAG during initial processing at a rate of 51.5%. Had Intrado's data management processes failed to detect such VoIP end user Registered Location entry errors or alias conditions, call routing to the correct PSAP could be impacted and the PSAPs' call dispatching systems might have failed to accept data during a live 911 call. Fortunately, Intrado passes all VoIP end user Registered Locations through the MSAG process; thereby, identifying errors for correction and ensuring that usable, unambiguous location information is available to selectively route a 911 call to the correct PSAP, as well as to provide for detailed caller and public safety information.

The MSAG validation process is considered to be a critical element in the deployment of the i2 standard soon to be approved by NENA. In addition to the importance of validating that the address is presented consistently, the MSAG process also identifies the Emergency Service Number (Emergency Zone) that the i2 standard proposes to utilize to make 911 call routing determinations. Without MSAG validation, routing determinations would be made via a geocoding process (similar to wireless call processing) that is not as accurate and may result in calls being routed to the wrong PSAP. Misrouted calls cause delays in the delivery of emergency services and may result in loss of life and/or property when seconds count.

Further, when a VoIP end user dials 911, the public safety community has every expectation that the ESN values stored in the MSAG will be used to display the

appropriate set of police, fire and medical agencies dedicated to delivering emergency services to the address of the caller. Delivery of such information during a call is currently impossible without first performing MSAG validation of the Registered Location. Recognizing this need, several VoIP Positioning Center (VPC) providers are already actively involved in developing this capability. Without MSAG validation and automatic identification of the response agencies assigned to the caller's location, call takers must manually make such determinations; further impacting response time.

Lastly, in some PSAPs the ESN value contained in the MSAG is used to selectively transfer the caller and location information to the appropriate emergency respondent dispatchers. The selective transfer capability is unavailable for calls failing to contain an appropriate ESN value available only through the MSAG validation process. In such instances, the calls must be manually transferred, negatively impacting the emergency response period.

As such, Intrado requests the Federal Communications Commission (Commission) to impose rules that;

1. Require Registered Location information provided by the VSP to be validated to the MSAG.
2. Require the custodian of the MSAG record, public safety or the local exchange companies, to permit access to MSAGs for VSP/VPC providers.
3. Recognize the need to alter and modify the consumer's Registered Location, in order to deliver a properly routed 911 call via the MSAG validation process. As stated above, this process is necessary in order to achieve the spirit of the Commission's Order[3]. As such, Intrado also seeks the Commission's attention to Section 54 of the Order, whereby the Commission has said "in an analogous context, before we would consider taking any action to preempt liability under state law, the Commission would need to demonstrate that limiting liability is essential to achieving the goals of the Act."[4] Currently, the same liability protections are afforded to both wireline and wireless providers because the MSAG validation process is essential to the proper delivery of an emergency call and therefore, essential to achieving the goals as prescribed in the Order.[5] Therefore, Intrado also seeks the Commission's serious attention to this liability matter as it relates to the address validation process, i.e. achieving accurate routing of all calls for emergency services from users of IP-enabled devices.
4. Provide cost recovery for the providers developing the technology that enables delivery of the appropriate police, fire, and medical information through use of the ESN values contained in the MSAG.

[3] *IP-Enabled Services; E911 Requirements for IP Enable Service Providers*,
WC Docket No. 04-36; WC Docket No. 05-196, First Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd 10245 (2005).

[4] Order at 31.

[5] Order at 46-8.

5. Provide a mechanism for the security of information relative to the public safety systems infrastructure.

Immediate action by the Commission to enable these requirements will ensure VoIP E911 callers are provided an equivalent level of emergency services to that of wireline. Without such changes, the impact of purely passing the Registered Location without validating to the MSAG would be:

1. Delays with the emergency services response.
2. Errors in call routing and data display for call takers.
3. The incremental labor costs incurred at the PSAP to update the CAD and GIS data bases with the Registered Locations, after an actual 911 call has occurred (remember the only way they will know of a CAD/GIS address mismatch is when a Registered Location is received containing an address that is not contained in their systems).
4. The increased use of dispatch resources to manually process calls for Registered Locations not yet contained in their CAD and GIS systems.
5. The higher cost of increased property damage caused by delayed dispatches of emergency response personnel as a result of manually processing a call that results in the display of a Registered Location not yet contained in the GIS/CAD data bases.

II. Ability to Access Selective Router Via the Public Switched Telephone Network (PSTN)

While Intrado is in agreement with the Petition regarding the use of the PSTN solution as an alternative method of providing VoIP/E911 on an interim basis, Intrado requests that the Commission continue to remain technology neutral on what solutions are acceptable. Intrado asks the Commission to recognize that the use of a solution that delivers a native 911 call via a switched-access network configuration to the 911 Selective Router is a viable option, while also allowing for multiple network solutions to accomplish the goals of the Commission's Order[6].

III. Automatically Obtained Location Information As "Registered Location"

Intrado is in agreement with the Petition's request for the Commission "to clarify that it is permissible to rely on accurate automatic location information as the "Registered Location" for purposes of the Commission's rule."[7] In addition, Intrado believes that both the automatic location information (X, Y coordinates), along with the Registered Location must be delivered to the PSAPs from consumers that utilize "converged wireless" devices.[8] This will ensure that data integrity is preserved and will provide the PSAPs with the most accurate location information, thereby improving the response time

[6] *Ibid*.

[7] *Petition* at 8.

[8] *Ibid*

during emergency situations. If a user of a converged wireless device happens to move and calls 911 before updating their Registered Location, it would be extremely beneficial for the PSAP to have the automatic location information in order to ensure the end user expeditiously receives the desired emergency services.

In turn, Intrado believes more lives and property will be saved if both the X, Y coordinates and the Registered Location are passed to the PSAPs and asks the Commission to make this a requirement for all converged wireless devices. Additionally, Intrado encourages the Commission to look beyond the traditional wireless location data elements to other critical information that is of value to a 911 call taker while managing emergency situations. This information would include Customer Name, Callback Number, Class of Service, Service Provider Company ID and Public Safety Responding Agencies and is akin to what is provided in most E911 systems today for circuit switched wireline callers.

CONCLUSION

Intrado reiterates its support of the fundamental principles of the *Order* and for reasons stated above, Intrado respectfully requests clarification of the *Order* with regard to the specific issues discussed herein.

Respectfully Submitted,

/s/_____

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